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March 28, 2001

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, D.C. 20554

Cheryl L. Parrino
Chief Executive Officer
Universal Service Administrative Corp.
2120 L St., N.W., Suite 600
Washington, D.C. 20037

No. of Copies rec'd 0+2
LHAB CDE

**Re: Federal-State Joint Board on Universal Service,
CC Docket No. 96-45 /**

Dear Ms. Salas and Ms. Parrino:

On behalf of Western Wireless Corp. and its wholly-owned subsidiaries, WWC Holding Co., Inc., WWC License LLC, and WWC Texas RSA Limited Partnership (collectively, "Western Wireless"), I am enclosing nine different Declarations of Gene DeJordy, Vice President, Regulatory Affairs. Mr. DeJordy certifies that Western Wireless will use all universal service funding that it receives for the states of California, Iowa, Kansas, Minnesota, Nebraska, Nevada, North Dakota, Texas, and Utah only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C. § 254(e) and 47 C.F.R. § 54.313.

Carriers that are not subject to rate regulation by state commissions "may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the appropriate certification to the Commission." *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (1999). Consistent with this directive, Western Wireless is submitting the attached Declarations to the respective public utility commissions of California, Iowa,

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Kansas, Minnesota, Nebraska, Nevada, North Dakota, Texas, and Utah, to facilitate those states' certifications pursuant to 47 C.F.R. § 54.313.

If you have any questions, please contact me.

Respectfully submitted,

A handwritten signature in black ink, reading "David Sieradzki". The signature is written in a cursive, flowing style.

David L. Sieradzki
Counsel for Western Wireless

Enclosures

cc: Katherine Schroder, FCC
Anita Cheng, FCC
Richard Smith, FCC
Irene Flannery, USAC
Robert Haga, USAC

DECLARATION OF GENE DEJORDY

1. My name is Gene DeJordy. My title is Vice President, Regulatory Affairs, Western Wireless Corporation. My business address is 3650 – 131st Ave., S.E., Suite 400, Bellevue, Washington 98006, and my business telephone number is (425) 586-8055.

2. WWC License LLC, a wholly-owned subsidiary of Western Wireless Corporation (both referred to as “Western Wireless”), is a commercial mobile radio service (“CMRS”) carrier that is not subject to rate and entry regulation by the Commission pursuant to Section 332(c)(3) of the Telecommunications Act. Western Wireless was designated as an eligible telecommunications carrier (“ETC”) in portions of the state of California, for purposes of receiving federal universal service support (Resolution T- 16436, dated July 20, 2000).

3. Section 254(e) of the Communications Act, 47 U.S.C. § 254(e), provides that ETCs receiving universal service funding must “use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313. The FCC has stated that carriers that are not subject to rate regulation by state commissions “may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the

appropriate certification to the Commission.” *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (1999).

4. In the near future, Western Wireless will launch a universal service offering in the manner contemplated by the FCC in the ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in California only for the purposes of the provision, maintenance, and upgrading of facilities and services for which the support is intended.

5. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly price of \$14.99, which includes all local usage. This is substantially less than Western Wireless’ prices for conventional cellular service plans in California, which range from \$14.99 per month plus 65 cents per minute for any usage, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.


6. Second, Western Wireless will use federal high cost universal service funds to support the deployment of the facilities used to offer the supported universal service. Western Wireless provides WRS using the same cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service, with one important exception: WRS is more costly to provide than conventional cellular service because

of the cost of the wireless local loop (“WLL”) units used to provide the service. The WLL units cost Western Wireless approximately \$400 per unit. Western Wireless will use federal high cost universal service support to help defray the cost of these units.

7. Third, Western Wireless will use federal high cost universal service funds to support the upgrading and maintenance of the network facilities to the extent necessary to provide the supported service. As noted above, Western Wireless will provide WRS using the same cellular network facilities, including cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service. But Western Wireless anticipates that it will need to extend and expand the capability of these facilities to support WRS customers. To ensure that it provides high-quality service to all WRS customers – particularly customers in remote areas who may be distant from existing Western Wireless cell sites – Western Wireless expects that it will need to expand its cellular network facilities, possibly including the installation of additional cell sites, transmitters, and receivers. This is so because WRS customers have higher network usage, coverage, and signal quality requirements than conventional cellular service.

8. All of the federal high cost universal service funds that Western Wireless receives will be used to support one or more of the programs described above. Accordingly, Western Wireless will be in compliance with 47 U.S.C. § 254(e).

I declare under penalty of perjury that the foregoing is true and correct.


Gene DeJordy

DECLARATION OF GENE DEJORDY

1. My name is Gene DeJordy. My title is Vice President, Regulatory Affairs, Western Wireless Corporation. My business address is 3650 – 131st Ave., S.E., Suite 400, Bellevue, Washington 98006, and my business telephone number is (425) 586-8055.

2. WWC License LLC, a wholly-owned subsidiary of Western Wireless Corporation (both referred to as “Western Wireless”), is a commercial mobile radio service (“CMRS”) carrier that is not subject to rate and entry regulation by the Commission pursuant to Section 332(c)(3) of the Telecommunications Act. Western Wireless was designated as an eligible telecommunications carrier (“ETC”) in portions of the state of Iowa, for purposes of receiving federal universal service support (Docket No. 199 IAC 39.2(4)).

3. Section 254(e) of the Communications Act, 47 U.S.C. § 254(e), provides that ETCs receiving universal service funding must “use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313. The FCC has stated that carriers that are not subject to rate regulation by state commissions “may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the

appropriate certification to the Commission.” *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (1999).

4. In the near future, Western Wireless will launch a universal service offering in the manner contemplated by the FCC as evidenced in the Iowa ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in Iowa only for the purposes of the provision, maintenance, and upgrading of facilities and services for which the support is intended.

5. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly price of \$14.99, which includes all local usage. This is substantially less than Western Wireless’ prices for conventional cellular service plans in Iowa, which range from \$14.99 per month plus 65 cents per minute for any usage, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.

6. Second, Western Wireless will use federal high cost universal service funds to support the deployment of the facilities used to offer the supported universal service. Western Wireless provides WRS using the same cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service, with one important exception: WRS is more costly to provide than conventional cellular service because

of the cost of the wireless local loop (“WLL”) units used to provide the service. The WLL units cost Western Wireless approximately \$400 per unit. Western Wireless will use federal high cost universal service support to help defray the cost of these units.

7. Third, Western Wireless will use federal high cost universal service funds to support the upgrading and maintenance of the network facilities to the extent necessary to provide the supported service. As noted above, Western Wireless will provide WRS using the same cellular network facilities, including cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service. But Western Wireless anticipates that it will need to extend and expand the capability of these facilities to support WRS customers. To ensure that it provides high-quality service to all WRS customers – particularly customers in remote areas who may be distant from existing Western Wireless cell sites – Western Wireless expects that it will need to expand its cellular network facilities, possibly including the installation of additional cell sites, transmitters, and receivers. This is so because WRS customers have higher network usage, coverage, and signal quality requirements than conventional cellular service.

8. All of the federal high cost universal service funds that Western Wireless receives will be used to support one or more of the programs described above. Accordingly, Western Wireless will be in compliance with 47 U.S.C. § 254(e).

I declare under penalty of perjury that the foregoing is true and correct.



Gene DeJordy

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1. My name is Gene DeJordy. My title is Vice President, Regulatory Affairs, Western Wireless Corporation. My business address is 3650 – 131st Ave., S.E., Suite 400, Bellevue, Washington 98006, and my business telephone number is (425) 586-8055.

2. WWC License LLC, a wholly-owned subsidiary of Western Wireless Corporation (both referred to as “Western Wireless”), is a commercial mobile radio service (“CMRS”) carrier that is not subject to rate and entry regulation by the Commission pursuant to Section 332(c)(3) of the Telecommunications Act. Western Wireless was designated as an eligible telecommunications carrier (“ETC”) in portions of the state of Kansas, for purposes of receiving federal universal service support (Docket No. 99-GCC2-156-ETC).

3. Section 254(e) of the Communications Act, 47 U.S.C. § 254(e), provides that ETCs receiving universal service funding must “use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313. The FCC has stated that carriers that are not subject to rate regulation by state commissions “may formulate plans to ensure compliance with section 254(e), and present those plans to the state, so that the state may make the

appropriate certification to the Commission.” *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (1999).

4. Western Wireless has launched a universal service offering in the manner contemplated by the FCC in the ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in Kansas only for the purposes of the provision, maintenance, and upgrading of facilities and services for which the support is intended.

5. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly price of \$14.99, which includes all local usage. This is substantially less than Western Wireless’ prices for conventional cellular service plans in Kansas, which range from \$14.99 per month plus 65 cents per minute for any usage, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.

6. Second, Western Wireless will use federal high cost universal service funds to support the deployment of the facilities used to offer the supported universal service. Western Wireless provides WRS using the same cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service, with one important exception: WRS is more costly to provide than conventional cellular service because

of the cost of the wireless local loop (“WLL”) units used to provide the service. The WLL units cost Western Wireless approximately \$400 per unit. Western Wireless will use federal high cost universal service support to help defray the cost of these units.

7. Third, Western Wireless will use federal high cost universal service funds to support the upgrading and maintenance of the network facilities to the extent necessary to provide the supported service. As noted above, Western Wireless will provide WRS using the same cellular network facilities, including cell sites, towers, transmitters, receivers, mobile switching offices, and other network facilities that it uses to provide conventional cellular service. But Western Wireless anticipates that it will need to extend and expand the capability of these facilities to support WRS customers. To ensure that it provides high-quality service to all WRS customers – particularly customers in remote areas who may be distant from existing Western Wireless cell sites – Western Wireless expects that it will need to expand its cellular network facilities, possibly including the installation of additional cell sites, transmitters, and receivers. This is so because WRS customers have higher network usage, coverage, and signal quality requirements than conventional cellular service.

8. All of the federal high cost universal service funds that Western Wireless receives will be used to support one or more of the programs described above. Accordingly, Western Wireless will be in compliance with 47 U.S.C. § 254(e).

I declare under penalty of perjury that the foregoing is true and correct.


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3. Section 254(e) of the Communications Act, 47 U.S.C. § 254(e), provides that ETCs receiving universal service funding must “use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.” To implement this provision, the FCC adopted a rule providing that an ETC may receive certain types of federal universal service funding only if the state commission files a certification that all federal high-cost support provided to the carrier will be used as required in Section 254(e). 47 C.F.R. § 54.313. The FCC has stated that carriers that are not subject to rate regulation by state commissions “may formulate plans to ensure compliance with section

254(e), and present those plans to the state, so that the state may make the appropriate certification to the Commission.” *Federal-State Joint Board on Universal Service*, Ninth Report and Order and Eighteenth Order on Reconsideration, 14 FCC Rcd 20432, ¶ 97 (1999).

4. Western Wireless has launched a universal service offering in the manner contemplated by the FCC in the ETC Order. As certified herein, Western Wireless will utilize all federal high-cost universal service support that it will receive in its designated ETC service area in Minnesota only for the purposes of the provision, maintenance, and upgrading of facilities and services for which the support is intended.

5. First, Western Wireless will use federal high cost universal service funds to provide affordable universal service, referred to as “Wireless Residential Service” (“WRS”). Western Wireless intends to offer WRS at a flat-rate monthly price of \$14.99, which includes all local usage. This is substantially less than Western Wireless’ prices for conventional cellular service plans in Minnesota, which range from \$14.99 per month plus 65 cents per minute for any usage, to \$129.99 per month plus 25 cents per minute for usage over 1400 minutes per month.

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8. All of the federal high cost universal service funds that Western Wireless receives will be used to support one or more of the programs described above. Accordingly, Western Wireless will be in compliance with 47 U.S.C. § 254(e).

I declare under penalty of perjury that the foregoing is true and correct.


Gene DeJordy